

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN  
DISASTER SITE LITIGATION

**21 MC102 (AKH)**

NOTICE TO PRODUCE DOCUMENTS  
PURSUANT TO FEDERAL RULE OF  
CIVIL PROCEDURE 34

To: 200 Water Street/ NYU  
c/o Myra Needleman, Esq  
London Fischer, LLP  
59 Maiden Lane  
New York, New York 10038  
mneedleman@londonfischer.com

**PLEASE TAKE NOTICE**, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 200 Water Street, as referenced in the deposition of Stephanie Kung, on December 20<sup>th</sup>, 2012, at or about page as referenced below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merrill Lextranet.

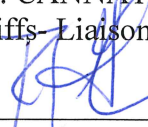
1. Any electronically stored information, including but not limited to e-mails regarding the 9/11 decontamination work performed at 200 Water Street, as requested on or about page 12 in the above referenced deposition.
2. Any photographs taken by the witness regarding work performed at 200 Water Street after September 11<sup>th</sup>, 2001, as requested on or about page 13 in the above referenced deposition.

3. An unredacted set of documents which are in the possession of NYU regarding this litigation and/or an explanation of each redaction on every page. as requested on or about page 18 in the above referenced deposition.
4. All facilities department documents and/or any other documents regarding the retention of ABM to work at 200 Water Street at and around September 11, 2001 and ABM's post-September 11, 2001 work at 200 Water Street, as requested on or about page 99 in the above referenced deposition.
5. The full contracts between ETS Contracting and NYU in effect prior to September 11, 2001, and/or any documentation between ETS and NYU, as requested on or about page 172 in the above referenced deposition.
6. Emergency response documents that were in existence as of 9/11/01, as requested on or about page 173 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation

Dated: New York, New York  
February 27, 2013

GREGORY J. CANNATA & ASSOCIATES  
Plaintiffs- Liaison Counsel

By:   
Robert A. Grochow, Esq.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279-0003  
(212) 553-9205